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CREDIT PAYMENT SERVICES, INC.*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FLEMMING KRISTENSEN, individually,  
and on behalf of a class of similarly situated  
individuals,

1           COME NOW Defendants Credit Payment Services, Inc. ("CPS"), Pioneer Services  
2 ("Pioneer"), LeadPile LLC ("LeadPile"), and Enova International, Inc. (Enova) (collectively,  
3 "Defendants"), by and through their respective counsel, and hereby submit this Joint Motion for  
4 Leave to Extend the Deadline for Disclosure of Rebuttal Expert Witness, by 30 days. The  
5 deadline is currently set for April 25, 2014 pursuant to the Order Granting extensions, pursuant to  
6 Defendants' Joint Motion to Extend Certain Deadlines (Doc. 167) entered by this Court April 4,  
7 2014. In support of this Motion, Defendants state as follows:

8           1. This Court entered a Stipulated Discovery Plan and Scheduling Order on July 23, 2013  
9 (the "Scheduling Order").

10           2. Plaintiff filed its Motion to Certify Class (Doc 113) on October 31, 2013 ("Motion to  
11 Certify"). This Court ruled on the Motion for Class Certification on March 26, 2014.

12           3. Defendants' filed a Joint Motion to Extend Certain Deadlines (Doc. 166), which was  
13 granted by order entered by this Court April 4, 2014 (Doc 167), which extended certain deadlines,  
14 including the deadline by which Rebuttal Expert Witnesses are to be disclosed. The Order set the  
15 deadline for disclosure of rebuttal expert witnesses to April 25, 2014 (30 days after the date the  
16 Court entered its order granting Motion for Class Certification).

17           4. Pursuant to the Court's Order (Doc. 167), discovery closes in this case on May 26,  
18 2014. The parties are still responding to discovery and producing documents. On or about April  
19 15, 2014, LeadPile produced a voluminous 13,000 plus row spreadsheet containing lead data it  
20 received from Co-Defendant ClickMedia, LLC d/b/a Net1Promotions, LLC ("ClickMedia") which  
21 had originated from "thesmartcreditsolution.securelinkcorp.com" website between March 28,  
22 2011 and February 29, 2012. Analysis of this data is crucial to Defendants' defense, and unlike  
23 Plaintiff's counsel, Defendants' counsel do not have staff capable of analyzing the data.

24           5. While the Defendants have retained a rebuttal expert, due to the voluminous nature of  
25 the raw data recently produced the expert will not be able to complete her analysis by the current  
26 April 25, 2014 deadline to disclosure rebuttal expert witnesses. Defendants' seek a short extension  
27 of time to designate the rebuttal expert and produce her expert report.

6. Pursuant to Local Rule 26-4, Defendants state that significant discovery between the parties have occurred. All parties have served and responded to all outstanding written discovery requests. However, on March 31, 2014, Plaintiff propounded his second set of interrogatories on CPS, Pioneer, and Enova; his third set of interrogatories on LeadPile; his second set of document requests on CPS, Pioneer, LeadPile, and Enova; and his first request for admissions on CPS, Pioneer, LeadPile, and Enova. The Defendants are in the process of compiling responses to this additional discovery. On April 11, 2014 Plaintiff also issued subpoenas to various Defendants, their employees, and shareholders. The parties are in the process of responding to the subpoenas scheduling these depositions.

7. If necessary, Defendants have no objection to producing the rebuttal expert for deposition after the May 26, 2014 discovery cutoff deadline.

8. Defendants have conferred with ClickMedia and ClickMedia has no objection to the proposed extension.

9. Defendants have conferred with Plaintiff Flemming Kristensen (“Plaintiff”) regarding the proposed extension and Plaintiff has indicated they will not oppose the extension.

10. The extension requested is not the result of any undue delay, bad faith or dilatory motive. Good cause exists and the request is not submitted for any improper purpose. No party will be prejudiced by this delay.

WHEREFORE, Defendants Credit Payment Services, Inc., Enova International, Inc., Pioneer Financial Services, Inc., and Leadpile LLC respectfully request this Court extend the deadline by which Rebuttal Expert Witnesses are to be disclosed to an additional 30 days from the current deadline of is April 25, 2014, or May 26, 2014, and for such other and further relief as the Court deems necessary, proper and just.

DATED: April 25, 2014

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21 *Attorneys for Defendant Enova International, Inc.*  
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23 IT IS SO ORDERED  
24

25 Dated: April, 29, 2014  
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27   
28 UNITED STATES MAGISTRATE JUDGE

1                   **CERTIFICATE OF SERVICE**

2                   Pursuant to FRCP 5(b), I certify that on April 24, 2014, I caused the above and foregoing  
3                   document entitled JOINT MOTION FOR LEAVE TO EXTEND THE DEADLINE FOR  
4                   DISCLOSURE OF REBUTTAL EXPERT WITNESS to be served on all counsel of record  
5                   through the Court's CM/ECF system.

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8                   /s/ Steven Martin Aaron  
9                   An Attorney for Defendants

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